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'AUG 27 1992'

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

Amendment of Section 90.631(g))
and (h) of the Commission's Rules)
and Regulations Concerning Wide)
Area Specialized Mobile Radio)
and Business Radio Systems)

RM-8029

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: The Commission

REPLY OF

SOUTHERN CALIFORNIA EDISON COMPANY

Southern California Edison Company (SCE), by its attorneys and pursuant to Section 1.405(a) of the Federal Communications Commission's (Commission's) rules, hereby respectfully submits this Reply to the August 12, 1992 Statements made on the above-referenced Petition for Rule Making of the National Association of Business and Educational Radio, Inc. (NABER).^{1/}

I. PRELIMINARY STATEMENT

1. SCE is the second largest electric utility in the nation, serving approximately nine million people across a 50,000 square mile expanse. To ensure its essential service is provided safely and efficiently, SCE maintains a large, complex land mobile network. SCE's land mobile network is critical in enabling the utility to meet its

^{1/} Public Notice, Report No. 23944, Petitions for Rule Making Filed, released July 13, 1992.

Mr. [illegible]
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enormous public safety and public service obligations. Land mobile communications are indispensable to the maintenance, repair and emergency preparedness activities associated with SCE's distribution system, its generating plants, and its major transmission lines.

2. SCE currently operates an 800 MHz trunked system at its San Onofre Nuclear Generating Station. SCE also is in the process of implementing a wide-area 900 MHz system to provide land mobile coverage across the utility's entire service territory. Once completed, SCE's 900 MHz system will be one of the largest, most sophisticated, private land mobile networks in the country. As the licensee of these significant 800 MHz and 900 MHz facilities, SCE has a strong interest in the issues raised in NABER's Petition.

II. REPLY

3. NABER's Petition seeks amendment of the rules to facilitate implementation of wide-area systems by SMR and Business pool eligibles. It argues that permitting these entities to license additional stations re-using authorized frequencies in an area 41 to 69 miles from an authorized primary station and creating a wide-area system without requiring appropriate loading for each stations would

encourage the re-use of frequencies by these entities in congested metropolitan areas and thereby promote efficient use of the spectrum.

4. The Statments made on NABER's Petition can be divided into two categories. Non-SMR entities generally discourage expansion of the wide-area rule, noting that it was originally adopted to foster the development of secure, public-safety related systems.^{2/} These entities also note that NABER's proposal contravenes this intent and that, if anything, the prososal would encourage unnecessary consumption of spectrum. The other Statements support expansion of the wide-area rule for SMRs, but suggest that the issue be addressed in the context of an overhaul of the SMR rules.


5. SCE does not oppose the suggestion that the wide-area rule be revised for SMRs in the context of a larger proceeding focused on SMRs. SCE, however, concurs with the non-SMRs that the Commission should not expand the wide-area rule to cover any Business eligible. The initial

^{2/} In this regard, the American Petroleum Institute notes that the wide-area rule should be expanded to cover any system, regardless of its eligibility, which serves an essential, public-safety related purpose. SCE believes this proposal is consistent with the intent of the current rule.

reasons for limiting wide-area authority to certain non-SMRs has not changed. Moreover, NABER has presented no rationale to suggest that those reasons are now not valid, nor has NABER demonstrated that its proposal would avoid unnecessary spectrum consumption.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

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Dated: August 27, 1992

CERTIFICATE OF SERVICE

I, Wendy Unsworth, a secretary at the law firm of Keller and Heckman, do hereby certify that on this 27th day of August 1992, I forwarded to the parties listed below a copy of the foregoing Reply of Southern California Edison Company by first-class mail, postage pre-paid:


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